

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DREW DIXON,

Plaintiff,

Case No. 1:23-cv-09878-VEC

v.

ANTONIO MARQUIS "L.A." REID,

Defendant.

**DECLARATION OF KATE E. MANGELS,
ESQ. IN SUPPORT OF MOTION TO
WITHDRAW AS COUNSEL FOR
DEFENDANT ANTONIO MARQUIS
"L.A." REID**

Pursuant to 28 U.S.C. § 1746, Kate E. Mangels, Esq. hereby declares as follows:

1. I am a member in good standing of the bar of the State of California, and am admitted *pro hac vice* in this action. I respectfully submit this declaration pursuant to Local Civil Rule 1.4 in support of the accompanying Notice of Motion to Withdraw as Counsel of Record for Defendant Antonio Marquis "L.A." Reid in the above-captioned action.

2. I am a partner at Kinsella Holley Iser Kump & Steinsapir LLP, counsel of record for Mr. Reid. I am counsel for Mr. Reid, who is also represented in this action by Shawn Holley, Gregory P. Korn, and Suann MacIsaac of the same firm.

3. Mr. Reid was also previously represented by Bobbi C. Sternheim, Esq., who served as local counsel to my firm. On May 31, 2025, the Court entered an order granting Ms. Sternheim's motion to be relieved as counsel for Mr. Reid.

4. As further explained in the accompanying declaration of Shawn Holley, Esq., there has been a breakdown in the attorney-client relationship between Mr. Reid and our firm, including as a result of Mr. Reid's persistent failure to pay fees owed to the firm despite repeated

requests.

5. My firm, my partners, and I cannot afford to continue representing Mr. Reid without compensation.

6. All fact and expert discovery in the case is complete. A motion for summary adjudication, and *Daubert* motions to exclude Plaintiff's disclosed experts, have been filed by my firm on Mr. Reid's behalf. Financial discovery is ongoing in the case. Trial is scheduled for September 8, 2025.

7. This motion to withdraw is made after my firm has exhausted all efforts to obtain payment for our services, and at a point in time at which Mr. Reid will have sufficient time to engage replacement counsel for the September 8, 2025 trial.

8. I am not asserting a retaining or charging lien.

9. My firm has informed Mr. Reid of our intention to file this motion for withdrawal as counsel absent his payment of the firm's invoices, and I understand Mr. Reid has not responded.

WHEREFORE, I request that the Court enter an Order permitting me to withdraw as counsel of record for defendant Antonio Marquis "L.A." Reid in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 9, 2025

By: 

KATE E. MANGELS